

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

**MARC GRANO as personal representative §  
of the WRONGFUL DEATH ESTATE §  
OF JONATHAN ANDREW GARCIA §  
and a Next Friend to J.O.G., A.S.R., An.J.G §  
and Ar.J.G §**

**Plaintiff,**

**v.**

**Case No. 1:20-cv-00147-PJK-KK**

**STATE OF NEW MEXICO, GREGG §  
MARCANTEL, New Mexico Secretary of §  
Corrections, DAVID JABLONSKI, New §  
Mexico Secretary of Corrections, §  
CLARENCE OLIVAS, Deputy Warden §  
Of Penitentiary of New Mexico, BRIAN §  
LUCERO, Corrections Officer, FNU §  
MARTINEZ, Corrections Officer, FNU §  
BACA, Captain, Corrections Officer, FNU §  
WELLS, Sergeant, Corrections Officer, and §  
JOHN DOES 1 through 5, employees, §  
staff, agents of Penitentiary of New Mexico, §**

**Defendants.**

**AMENDED NOTICE TO TAKE VIDEOTAPED ZOOM DEPOSITION  
DUCES TECUM OF ALON ABRAHAM STEINBERG, M.D.**

Defendants, *State of New Mexico, Gregg Marcantel, New Mexico Secretary of Corrections; David Jablonski, New Mexico Secretary of Corrections; Clarence Olivas, Deputy Warden of Penitentiary of New Mexico; Brian Lucero, Corrections Officers; FNU Martinez, Corrections Officer; FNU Baca, Corrections Officer; FNU Wells, Sgt. Corrections Officer; and John Does 1 through 5, employees, staff, agents of Penitentiary of New Mexico* (“State of New Mexico”), by and through their counsel of record, GARCIA LAW GROUP, LLC (Bryan C. Garcia, Meghan S. Nicholson, and Rodney L. Gabaldon), and pursuant to Rule 30 FRCP, hereby gives notice that Defendants will take the deposition of *Alon Abraham Steinberg, M.D.* on

*Monday, May 2<sup>nd</sup>, 2022, beginning at 5:00 p.m. (MDT) and continuing until completed*, via remote audio-video conference before a certified court reporter and videographer.

Please take further notice that Defendants may use said deposition at trial, pursuant to Rule 32 FRCP, or for any purpose permitted under the Federal Rules of Civil Procedure.

**Dr. Steinberg is to bring the following documentation with him to the deposition, or to provide it in electronic format via email to [bgarcia@garcialawgroupllc.com](mailto:bgarcia@garcialawgroupllc.com), [mnicholson@garcialawgroupllc.com](mailto:mnicholson@garcialawgroupllc.com), [rgabaldon@garcialawgroupllc.com](mailto:rgabaldon@garcialawgroupllc.com), and [sjohnson@garcialawgroupllc.com](mailto:sjohnson@garcialawgroupllc.com), 48 hours in advance of his deposition:**

- 1) His entire file regarding this lawsuit, including, but not limited to retention letters, correspondence to/from Plaintiffs' counsel's office and any medical records or other materials he has reviewed in relation to this case;
- 2) His most recent Curriculum Vitae;
- 3) His complete billing file for his expert and/or consulting services in this case, including, but not limited to charges rendered, statements rendered and any documents indicating time spent on reviewing this case;
- 4) Any notes, reports, correspondence or other documents prepared by him in review of this case, or which indicate his expert and/or medical opinion in this case;
- 5) Any articles, papers, books, texts, treatises, or other written materials on which he has relied or consulted in review of this case, or on which he has relied or consulted in forming his expert and/or medical opinion in this case;
- 6) A list of cases in which he has been retained as a consulting or testifying expert within the last ten (10) years;
- 7) Copies of all deposition or trial testimony transcripts of testimony by Dr. Lee in

cases where he has served as a consulting or testifying expert in the last ten (10) years that are within his possession or control;

- 8) Any exhibits he has prepared for this case; and
- 9) Any other documents or records, in any media or format, which he has reviewed in connection with this case.

Respectfully submitted:

**GARCIA LAW GROUP, LLC**

*/s/ Rodney Gabaldon*

RODNEY L. GABALDON

MEGHAN S. NICHOLSON

BRYAN C. GARCIA

*Attorneys for Defendants*

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**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that on the *13th* day of *April, 2022*, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using CM/ECF system and has been served on Plaintiff, pursuant to Federal Rules of Civil Procedure as follows:

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BY: //s// Rodney Gabaldón  
Rodney Gabaldón